

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

Lessard, et. al.,  
Plaintiffs,

Case No. ~~00-74306~~ **87-70992**

Hon. John Feikens

v.

City of Allen Park, et al.,  
Defendants.

**WAYNE COUNTY'S DISCLOSURE OF  
WITNESSES WITH REGARD TO 100-  
YEAR RAIN EVENT**

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**FILED**  
2001 OCT 22 1P 3 06  
U.S. DIST. COURT CLERK  
EAST DIST. MICH.  
DETROIT

October 18, 2002

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# **WAYNE COUNTY'S DISCLOSURE OF WITNESSES WITH REGARD TO 100-YEAR RAIN EVENT**

Pursuant to the Court's direction, Wayne County identifies persons with knowledge of the determination of a "100-year" storm event for the Wayne County area and with knowledge of the amount of rainfall on September 10-12, 2000, as follows:

Person	Employer	Subject Matter
Mark Tenbroek	Camp, Dresser & McKee ("CDM")	Derivation of the "100-year" storm as a point estimate and conversion to an area estimate
James Scholl	TetraTech MPS	Review of CDM estimate and supervision of modifications thereto, if any
Steve Kalinowski	Wade Trim & Associates	Use of rainfall estimate in facility design
Karen Ridgway	Applied Science	Use of rainfall estimate in sewer flow modeling
Thomas Knueve	Surface Water Quality Division, MDEQ	Process by which MDEQ and communities agreed upon 100-year rain storm as a design standard
Osama Khaimi	Surface Water Quality Division, MDEQ	Derivation of 100-year design storm and adoption of design standards for stormwater facilities
John Baratta	Wade Trim & Associates	Overall knowledge of derivation of 100-year storm and use in system design
Mark Coleman	Wade Trim & Associates	Design storms for Allen Park and Lincoln Park Retention Basins
Rick Facione	Wayne County Department of Environment	September, 2000 rainfall data

All witnesses are located in Southeast Michigan except James Scholl who is located in Lansing.

The basic data source for the derivation of the 100-year storm is National Weather Service Technical Publication TP-40 (1961). NWS Publication HYDRO-35 may also have been used as a reference. Technical documentation prepared by Wayne County's contractors related to derivation of the 100-year storm is being retrieved from storage and will be identified upon retrieval and produced for inspection and copying.

Respectfully submitted,

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**PROOF OF SERVICE**

On the date below, I sent by First Class Mail a true copy thereof **Wayne County's Disclosure of Witnesses With Regard to 100-Year Rain Event** to counsel shown on the attached list.

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OCT 22 1992  
U.S. DISTRICT COURT  
EAST DISTRICT OF MICHIGAN  
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I declare that the statements above are true to the best of my information, knowledge, and belief.

Date: October 22, 2002

Signature: 

Name:

R. CRAIG HUPP